

### **REMARKS**

In this Amendment, Applicant has amended the specification to add brief descriptions to Fig. 9. The amendment is editorial in nature. It is respectfully submitted that no new matter has been introduced by the amended specification. All claims are now present for examination and favorable reconsideration is respectfully requested in view of the preceding amendments and the following comments.

### **INFORMATION DISCLOSURE STATEMENT:**

The Examiner indicated that certain references listed in the PTO 1449 form of the Information Disclosure Statement filed on March 19, 2002 were not in compliance to the requirements under 37 CFR 1.98(a)(5).

Applicant hereby respectfully resubmits the PTO 1449 form with the proper citations to the information obtained from the Internet. Please note that, for documents AJ, AK, AL, AM and AN, the publishers, authors, and the titles of the web pages have been provided to the extent known from the copies of these web pages. Proper fees have been enclosed regarding the submission of the Information Disclosure Statement. Please consider these references and properly indicate on the PTO 1449 form.

### **PRIORITY:**

The Examiner indicates that the certified priority document New Zealand Application No. 506004 has not been received. Applicant respectfully submits that the certified priority document was properly filed with International Bureau during the international stage of the PCT application. In any event, Applicant is seeking to submit a certified copy of the above priority document in due course.

### **OBJECTION TO SPECIFICATION:**

The specification has been objected as containing informality.

It is respectfully submitted that the informality contained in the specification have been corrected by adding the description to Fig. 9 as indicated above. Therefore, objection to the specification is overcome and withdrawal of the objection is respectfully requested.

REJECTIONS UNDER 35 U.S.C. § 102:

Claims 1 – 2 have been rejected under 35 U.S.C. § 102 (b) as allegedly being anticipated by Ahonen. et al. (“Assembling Documents from Digital Libraries”, 1997), hereinafter Ahonen.

Applicant traverses the rejection and respectfully submits that the present-claimed invention is not anticipated by the cited reference. It is respectfully submitted that there is no disclosure or teaching in Ahonen regarding the software that assists the creators of the digital library. The described architecture in Ahonen is for a document assembly process and is not an architecture for software that creates the components of the assembly process shown on the right hand side of Figure 3.

Regarding rejection to Claim 1, Claim 1 includes the feature of “means which dynamically create webpages applicable to a document which present document determined queries to the user’s browser and captures decisions made by the said user in response, together with unique user input data relevant only to the particular document being assembled.” It is respectfully submitted that Ahonen does not disclose or teach means that will dynamically create webpages. The only webpage disclosed that is presented to the users browser is that shown in Figure 4. However, it is in fact a static order form. It is simply a table of contents and chapters, sections and sub-sections and in some cases, paragraphs for a document or book that the assembler selects to incorporate in his desired compilation.

In addition, while the static HTML order form allows selections by clicks against the desired document components of text, it does not provide for the capture of “unique user input data.” Such “data” cannot simply be mouse clicks. This is clear from the claim which later requires “a data base which stores said user data” and software “that populates the assembled

document with said user data.” This data is substantial and real and not simply a selection-indicating click.

Furthermore, Ahonen does not disclose any “means for delivering the assembled document to said user” which are part of “a document assembly system resident on a web server.” The “means for delivering the assembled document to said user” is recited in the claim as one element comprising the web server resident document assembly system. This clearly excludes the physical delivery of a printed-paper document from the site of a publisher to the physical address of the user. Therefore, this feature of Claim 1 is not disclosed or taught by Ahonen.

Regarding rejection to Claim 2, Claim 2 is directed to “authorizing software for the creation of interactive webpages for a document assembly system resident on a web server.” Nowhere is such software disclosed in Ahonen. It is respectfully submitted that the Examiner may have misunderstood the content of Claim 2. At first, as pointed out above, Ahonen does not describe interactive web pages. Therefore, it certainly cannot describe the creation of such web pages. Claim 2 includes software which puts in place an essential section of the document assembly system claimed in Claim 1 and enables the working of such an assembly system. Clearly, the document assembly system needs to have pre-existing software to operate. Claim 2 is directed to such software that enables the creation of the components required to establish the document assembly system. However, Ahonen only discloses the webpage created, not the software claimed.

More specifically, Claim 2 includes that feature of “WP application software which allows the creation of standard text for each of a plurality of documents and which incorporates macros and data fields.” This feature is not disclosed in Ahonen as suggested by the Examiner. The Figure 3 overview indicates a browser used by a user making an order for a book on the server shown in Figure 3. This is not the feature that Claim 2 encompasses. Claim 2 includes software that allows the creation of standard text for each of a plurality of documents. In Ahonen, the only disclosure of standard text for books is that in section 2.1 where it is said that the books are originally prepared using MS WORD and from there structured STML versions are prepared. There is no disclosure that the standard text, however it may be created, “incorporates macros and data fields” as required by Claim 2.

Claim 2 further includes the feature of “software which includes means which creates interactive webpages for said web server.” Ahonen does not disclose means for creating

interactive webpages. Again, the Examiner's reference to Figure 3 is inappropriate since Figure 3 does not show any means for creating interactive web pages. Ahonen simply states that the HTML page shown in Figure 4 is available on the web server. It does not disclose means for creating this page. Claim 2 indicates that the interactive web page is created so as not only to capture decisions made by the user, but also capture "unique user data input." The Ahonen webpage shown in Figure 4 does not capture unique user data input in addition to decisions made in response to queries.

For the feature of "means which establish rules for the storage for said user decisions and data input", contrary to the Examiner's understanding, this feature is not disclosed in Ahonen at page 5, Figure 3 or anywhere else. Ahonen does mention "heuristics" at page 6. However, these are not disclosed as being an integral part of authoring software and certainly have nothing to do with the storage of user decisions and user input data.

For the feature of "means which generate document specific macros and fields for document text in said WP application", no such means incorporated within software, which makes up the authoring software together with WP application software, is disclosed in Figure 1 of Ahonen. Figure 1 simply shows a top-level assembly process and not the process for authoring the "document collection" and "document fragments" which bear the closest analogy to what is being referred to in Claim 2.

For the feature of "means which select and trigger appropriate macros based on decisions captured by said web pages and populate appropriate fields with user input data", the Examiner is incorrect in thinking that Figure 3 of Ahonen fulfils this requirement. Firstly, the browser of Figure 3 is the browser used by the document assembler and is not used for authoring software for the creation of interactive web pages. Secondly, neither Figure 3 nor the accompanying text in any way discloses "means which select and trigger appropriate macros based on decisions captured by the web pages." Thirdly, there is no disclosure whether for assembly or any other purpose of means which populate fields with user input data.

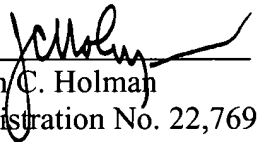
In summary, Ahonen does not anticipate that present invention as defined in Claims 1 – 2. Therefore, the rejection under 35 U.S.C. §102 has been overcome. Accordingly, withdrawal of the rejections under 35 U.S.C. §102 is respectfully requested.

Having overcome all outstanding grounds of rejection, the application is now in condition for allowance, and prompt action toward that end is respectfully solicited.

Respectfully submitted,

JACOBSON HOLMAN PLLC

Date: December 20, 2004  
(202) 638-6666  
400 Seventh Street, N.W.  
Washington, D.C. 20004  
Atty. Dkt. No.: P67146US0  
JCH/JC

By   
John C. Holman  
Registration No. 22,769